

**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

**IN RE:** ) **CHAPTER 13**  
**JAMES CURTIS CRAWFORD** ) **CASE: A18-60045-WLH**  
 )  
 )  
 )  
**DEBTOR** )

**CHAPTER 13 TRUSTEE'S OBJECTION TO CONFIRMATION  
AND MOTION TO DISMISS CASE**

COMES NOW, Nancy J. Whaley, the Standing Chapter 13 Trustee herein, and objects to Confirmation of the plan for the following reasons:

1.

The Debtor's payments under the proposed plan are not current, thus indicating that this plan is not feasible. 11 U.S.C. Section 1325(a)(6).

2.

The Debtor has failed to provide to the Trustee a copy of the 2017 tax return filed with Internal Revenue Service in violation of 11 U.S.C. Section 521(e)(2)(A).

3.

The Debtor has failed to file the sixty (60) days of pay advices pursuant to 11 U.S.C. Section 521(a)(1).

4.

The funding of post-petition mortgage installments of \$790.00 have not been maintained in the above-styled Chapter 13 case, thereby rendering the proposed plan infeasible in violation of 11 U.S.C. Section 1325(a)(6).

5.

The plan fails to treat the priority claim of Internal Revenue Service in violation of 11 U.S.C. Section 1322(a) and/or 11 U.S.C. Section 502(a).

6.

The Chapter 13 plan proposes to pay \$5,500.00 to the Debtor's attorney for payment of attorney fees. The Trustee is unable to determine whether this is a reasonable fee and requests that Debtor's counsel appear at Confirmation and be prepared to present evidence to the Court regarding the reasonableness of the requested fee.

WHEREFORE, the Trustee moves the Court to inquire into the above objections, deny Confirmation of the Debtor's plan, and to dismiss the case.

This the 30th day of July, 2018.

Respectfully submitted,

/s/ \_\_\_\_\_  
Nancy J. Whaley  
Standing Chapter 13 Trustee  
State Bar No. 377941

**CERTIFICATE OF SERVICE**

Case No: A18-60045-WLH

This is to certify that I have this day served the following with a copy of the foregoing Chapter 13 Trustee's Objection To Confirmation And Motion To Dismiss Case by depositing in the United States mail a copy of same in a properly addressed envelope with adequate postage thereon.

**Debtor(s)**

JAMES CURTIS CRAWFORD  
2224 CREEKVIEW TRAIL  
DECATUR, GA 30035

**By Consent of the parties**, the following have received an electronic copy of the foregoing Chapter 13 Trustee's Objection To Confirmation And Motion To Dismiss Case through the Court's Electronic Case Filing system.

**Debtor(s) Attorney:**

SLIPAKOFF & SLOMKA, PC  
se@myatllaw.com

This the 30th day of July, 2018.

/s/ \_\_\_\_\_  
Nancy J. Whaley  
Standing Chapter 13 Trustee  
State Bar No. 377941  
303 Peachtree Center Avenue, NE  
Suite 120  
Atlanta, GA 30303